

# **SKOUFALOS AFFIDAVIT**

**MAY 21, 2008**

**EXHIBIT K**

TOP URGENT

KIND ATTN OF MRS. MARIA GERAKARI  
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REF OUR MV AL MUHIEDDINE / LAST FIXTURE CP ACCNT SUNDERSONS

D.OWNERS CLAIM AGAINST SUNDERSONS NIGERIA CLAIM FOR UNPAID  
BALANCE OF FREIGHT DUE AND FOR UNPAID DEMURRAGES DUE  
WHICH BOTH ABOVE LONG TIME OVER DUE (STILL REMAINING  
UNPAID )

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HEREBELOW PASSING TO YOU FROM OUR /D.OWS COMPUTER FILES THE FOLL MESSAGE WITH  
ATTACHEMENT LETTER WE RECEIVED FOR ANOTHER VSL ( THE MV SYRIA STAR ) WE HAVE  
FIXED AS BROKERS ACCOUNT  
SUNDERSONS NIGERIA AND THE CONTENTS OF SAME IS SELF  
EXPLANATORY  
SHOWING CLEARLY THE RELATION OF SUNDERSONS NIGERIA  
WITH MILAN GROUP NIGERIA I.E. YOU CAN EASILY SEE / UNDERSTAND  
FM CONTENTS THAT SUNDERSONS NIGERIA THAT SAID COMPANY  
IS ARM OF THE MILAN GROUP (I.E. AFFILIATED - SISTER COMPANY)  
PLS SEE HEREBELOW / HEREWITH ATTACHED MESSAGE WITH AN  
ATTACHEMENT.

BST REGARDS

==  
QUOTE  
==  
\_\_\_\_\_

From: capt mohamad [mailto:aliman.s@scs-net.org]

Sent: Thursday, February 22, 2007 3:48 AM

To: operation

Cc: 'SYRIA STAR'; 'Chrysanthou Maritime Services Ltd'

Subject: Re: m/v syria star / account sundersons

dear mr christos

with regards to below matter, please advice charters to cover this amount, and supply the vessel with 100 mt of fw at lagos.

thanks + brgds

mohamad esmaeil

----- Original Message -----

From: operation <mailto:operations@milannigeria.com>

To: 'Reem Maritime <mailto:aliman.s@scs-net.org> LTD'

Cc: 'SYRIA <mailto:J8B3493@globeemail.com> STAR'; 'Chrysanthou Maritime Services Ltd' <mailto:services@chrysanthou-maritime.com>

Sent: Wednesday, February 21, 2007 12:36 AM

Subject: RE: m/v syria star

Please note the charges of supplying FW to MV Syrian Star.

USD 8 per ton : 100 mt : 800 dollars

Kindly advise master to give this sum to enable us to arrange the Fresh Water.

Regards  
Dhanesh Nair

M

SUNDERSONS

MILAN GROUP

Head Office: 243B, Kafo Abayomi Street,  
Victoria Island, Lagos.  
Operations Office : Plot G-2,  
Mashood Abiyola Way, Iganmu, Lagos  
Cell : 00234 8035354407, 00234 1 7764595 Tel:-01-5801400, 4002-5,  
Fax:-01-5801401  
Email: <mailto:operations@sundersons.com> operations@sundersons.com,  
<mailto:operations@milannigeria.com> operations@milannigeria.com

-----Original Message-----

From: Reem Maritime LTD [mailto:aliman.s@scs-net.org]  
Sent: Monday, February 19, 2007 3:16 PM  
To: operation  
Cc: SYRIA STAR; Chrysanthou Maritime Services Ltd  
Subject: m/v syria star

dear peter

please supply m/v syria star with 100 mt of fw

REEM MARITIME LTD  
4 ASI ALRAHBANI STRE  
ALHAWWOZ ZONE  
TARTOUS - SYRIA  
P.O.BOX 397

TEL : +96343215562/3

FAX : +96343221848

E-MAIL: aliman.s@scs-net.org

**SKOUFALOS AFFIDAVIT**

**MAY 21, 2008**

**EXHIBIT L**



Decide with Confidence

**D&B® Family Tree**  
**SIMRAN MEHER LTD (GIBRALTAR, GIBRALTAR)**

**May 20, 2008**

## Table of Contents

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### Family tree

VALECHHA HOLDINGS LTD (GIBRALTAR, GIBRALTAR)  
SIMRAN MEHER LTD (GIBRALTAR, GIBRALTAR)

## Companies

### VALECHHA HOLDINGS LTD

D-U-N-S ® : 535175723

Address: Suites 7B & 8B, 50 Town Range  
Location Status: Headquarter/Parent  
Primary SIC: 6719 - Investment holding company

City, State: GIBRALTAR,  
Country: GIBRALTAR

### SIMRAN MEHER LTD

D-U-N-S ® : 535175715

Address: Suites 7B & 8B, 50 Town Range  
Location Status: Single Location  
Primary SIC: 5099 - wholesaler of durable goods

City, State: GIBRALTAR,  
Country: GIBRALTAR

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## SIC Index

5099 - wholesaler of durable goods  
SIMRAN MEHER LTD (GIBRALTAR, GIBRALTAR)

6719 - Investment holding company  
VALECHHA HOLDINGS LTD (GIBRALTAR, GIBRALTAR)

## Geographical Index

### GIBRALTAR

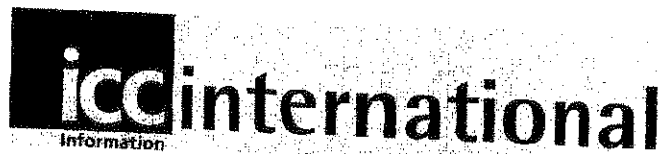
SIMRAN MEHER LTD (GIBRALTAR)

VALECHHA HOLDINGS LTD (GIBRALTAR)

**SKOUFALOS AFFIDAVIT**

**MAY 21, 2008**

**EXHIBIT M**



## References

Customer name: ICC Information Limited

Our ref: 33480

## Status

Date: 20/12/2006

Speed: Flash

Report: Final

## IDENTIFICATION

## Given

Subject Name: Sundersons Ltd  
 Address: Lagos  
 Country: Nigeria

## Verified

Subject Name: SUNDERSONS LTD  
 Address: 52a Kofo Abayomi Street  
 Victoria Island  
 Town: Lagos  
 Country: Nigeria  
 Telephone: +234 (1) 4619702 / 3  
 Fax: +234 (1) 2614290  
 Email: info@milannigeria.com  
 Website: www.milannigeria.com

## EXECUTIVE SUMMARY

Date established: 1990  
 Legal form: Private Limited Liability Company  
 Sales Turnover: USD 250,000,000 (Consolidated 12 months, 31/12/2005)  
 Main activities: Forwarding and transportation services.  
 Employees: 45 (Subject); over 2,000 (Group)

## CREDIT RISK RATING

## Risk Rating

As at 21.12.2006

## Analysis

Excellent  
 Good  
Satisfactory  
 Passable  
 Poor  
 No classification

- Organisational structure is stable
- Management is reasonably experienced
- No detrimental records found
- Financial performance is good
- Operational trend is steady
- No payment delays noted

## Interpretation

Moderate financial and operational base. Small credits can be considered with some confidence that commitments can be met under normal circumstances. A cautious credit control policy applies.

Credit Limit Recommended Limit: EUR 100,000

### REGISTRY DATA

#### Key Facts

Date established: 1990  
 Legal form: Private Limited Liability Company  
 Registry status: Live/Active

### LEGAL FILINGS

Bankruptcy Filings: None  
 Court Judgements: None  
 Tax Liens: None  
 Other: None

### MANAGEMENT & STAFF

#### Key Managers

Name: Dhanesh Nair  
 Job Title: Subject's General Manager  
  
 Name: Krishna Kumar  
 Job Title: Group General Manager - Marketing & Technical

Name: Mr. Amobi Ogudu  
 Job Title: Head - Legal & Administration

Name: Sandeep Garg  
 Job Title: Financial Manager

#### Key Advisors

Auditor: Dayo Omotosho  
 Head - Internal Audit & Accounts

#### Staff

No of employees 45 (Subject); over 2,000 (Group)

### BOARD OF DIRECTORS

#### Appointments

Name: Alhaji Suleiman Haruna  
 Board function: Director

Name: Krishna Kumar  
 Board function: Group General Manager - Marketing & Technical

Name: Rajesh Valecha  
 Board function: Group Managing Director  
 Address: Nigeria

Name: Ramesh S. Valecha  
 Board function: Group Chairman

Address: Nigeria  
 Name: Vikram Valecha  
 Board function: Group General Manager  
 Address: Nigeria

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### SHAREHOLDERS/OWNERS

How Listed      Full List

#### Composition

Name: MILAN NIGERIA LTD  
 % of shares: 100  
 Address: 243, Kofo Abayomi Street  
 Victoria Island  
 Lagos  
 Nigeria  
 +234 (1) 4619702 / 3  
 +234 (1) 2614290  
 info@milannigeria.com  
 www.milannigeria.com

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### CORPORATE AFFILIATIONS

#### Structure

Name: MILAN NIGERIA LTD  
 Affiliation type: Parent Company  
 Address: 243, Kofo Abayomi Street  
 Victoria Island  
 Lagos  
 Nigeria  
 +234 (1) 4619702 / 3  
 +234 (1) 2614290  
 info@milannigeria.com  
 www.milannigeria.com

Name: CONTI AGRO NIGERIA LIMITED  
 Affiliation type: Associate  
 Address: Nigeria

Name: MEDITARION NIGERIA LIMITED  
 Affiliation type: Associate  
 Address: Nigeria

Name: METRO HOTELS  
 Affiliation type: Associate  
 Address: Nigeria

Name: MILAN INDUSTRIES LIMITED  
 Affiliation type: Associate  
 Address: Nigeria

#### Comments

MILAN GROUP and its associate companies now cover a wide range of Products with interest in Shipping, Transport, Hotel, Import and Real Estate.

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**BANKING & FINANCING****Bankers**

Bank name: UNION BANK OF NIGERIA PLC  
 Address: Nigeria  
 Relationship type: Current Account

**Comments**

It is generally not the policy of local banks to provide credit status information to non-bona fide applications, and interested parties would be advised to consult first with the Subject if banker's references are required.

**FINANCIAL ACCOUNTS****Description**

Required to file: No  
 Source: Industry Sources  
 Presentation: Key figures provided below  
 Date of accounts: 31-12-2005  
 Type of accounts: Estimated key figures  
 Currency: US Dollar (USD)

**Summarised**

Consolidation:	31-12-2005
Period:	Group Consolidated 12 months
Sales Turnover:	250,000,000

**OPERATIONS & HISTORY****Activities**

Full description: The Subject provides forwarding and transportation services also for the group purposes.

MILAN GROUP distributes about 300,000 tons of Parboiled rice into Nigeria. In a year, approximately 500,000 MT of cargoes comprising rice, sugar and fertilizers are handled. The company also handle 2,400 TU's carrying cube sugar, tyres and cars.

**Purchases**

Import: Europe.

**Sales**

Export: Neighbouring countries.

**PROPERTY & ASSETS****Premises**

The Subject operates from premises located at the heading address, consisting of administrative offices, warehouse space.

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### **PAYMENTS**

#### **Purchase Terms**

Local: Cash  
Credits 14-30 days  
Imports: L/Cs  
Credits 30 days net

#### **Sales Terms**

Local: Cash  
Credits 14-30 days  
Exports: L/Cs  
Credits 30 days net

#### **Payment Experience**

Payment Behaviour: As trade references were not supplied, the Subject's payment track record history CANNOT BE ACCURATELY DETERMINED, but payments are believed to be PROMPT.

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### **INVESTIGATIVE NOTES**

#### **Sources:**

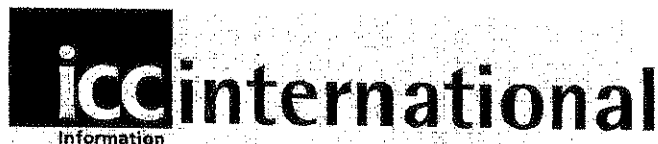
Interviews and material provided by the Subject  
Other official and local business sources

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**SKOUFALOS AFFIDAVIT**

**MAY 21, 2008**

**EXHIBIT N**



## References

Customer name: ICC Information Limited

Our ref: 33479

## Status

Date: 20/12/2006

Speed: Flash

Report: Final

## IDENTIFICATION

## Given

Subject Name: Milan Nigeria Ltd  
 Address: 52a Kofo Abayomi Street  
 Victoria Island  
 Lagos

Country: Nigeria

## Verified

Subject Name: Milan Nigeria Ltd  
 Address: 243, Kofo Abayomi Street  
 Victoria Island  
 Town: Lagos  
 Country: Nigeria  
 Telephone: +234 (1) 4619702 / 2626339 - 42  
 Fax: +234 (1) 2614290  
 Email: info@milannigeria.com  
 Website: www.milannigeria.com

## EXECUTIVE SUMMARY

Date established: 1981  
 Legal form: Private Limited Liability Company  
 Authorised Capital: N/A  
 Sales Turnover: USD 250,000,000 (12 months, 31/12/2006)  
 Main activities: General food trader.  
 Employees: 1,000

## CREDIT RISK RATING

## Risk Rating

As at 21.12.2006

## Analysis

Excellent  
 Good  
Satisfactory  
 Passable  
 Poor  
 No classification

- Organisational structure is stable
- Management is reasonably experienced
- No detrimental records found
- Financial performance is excellent
- Operational trend is steady
- No payment delays noted

**Interpretation** Moderate financial and operational base. Small credits can be considered with some confidence that commitments can be met under normal circumstances. A cautious credit control policy applies.

**Credit Limit** Recommended Limit: EUR 200,000

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### REGISTRY DATA

**Key Facts**  
 Date established: 1981  
 Legal form: Private Limited Liability Company  
 Registration no: RC 43724  
 Registry status: Live/Active

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### LEGAL FILINGS

Bankruptcy Filings: None  
 Court Judgements: None  
 Tax Liens: None  
 Other: None

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### MANAGEMENT & STAFF

#### Key Managers

Name: Krishna Kumar  
 Job Title: Group General Manager - Marketing & Technical

Name: Mr. Amobi Ogudu  
 Job Title: Head - Legal & Administration

Name: Rajesh Valecha  
 Job Title: Group Managing Director

Name: Sandeep Garg  
 Job Title: Financial Manager

Name: Vikram Valecha  
 Job Title: Group General Manager

#### Key Advisors

Auditor: Dayo Omotosho  
 Head - Internal Audit & Accounts

#### Staff

No of employees 1,000

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### BOARD OF DIRECTORS

#### Appointments

Name: Ramesh S. Valecha  
 Board function: Chairman  
 Address: Nigeria

Name: Rajesh Valecha  
 Board function: Group Managing Director  
 Address: Nigeria

Name: Vikram Valecha  
 Board function: Group General Manager  
 Address: Nigeria

Name: Alhaji Suleiman Haruna  
 Board function: Director  
 Address: Nigeria

Name: Krishna Kumar  
 Board function: Group General Manager - Marketing & Technical  
 Address: Nigeria

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### SHARE CAPITAL

#### Composition

Authorised: N/A

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### SHAREHOLDERS/ OWNERS

How Listed Major Shareholders Only

#### Composition

Name: Vikram Valecha  
 Address: Nigeria

Name: Ramesh S.Valecha  
 Address: Nigeria

Name: Rajesh Valecha  
 Address: Nigeria

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### CORPORATE AFFILIATIONS

#### Structure

Name: SUNDERSONS LTD  
 Affiliation type: Subsidiary  
 Address: Nigeria

Name: CONTI AGRO NIGERIA LIMITED  
 Affiliation type: Associate  
 Address: Nigeria

Name: MEDITARION NIGERIA LIMITED  
 Affiliation type: Associate  
 Address: Nigeria

Name: MEDITARION NIGERIA LIMITED  
 Affiliation type: Associate  
 Address: Nigeria

Name: METRO HOTELS

Affiliation type: Associate  
Address: Nigeria

Comments MILAN GROUP and its associate companies now cover a wide range of Products with interest in Shipping, Transport, Hotel, Import and Real Estate.

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#### Bankers

Bank name: UNION BANK OF NIGERIA PLC  
Address: Nigeria  
Relationship type: Current Account

Comments It is generally not the policy of local banks to provide credit status information to non-bona fide applications, and interested parties would be advised to consult first with the Subject if banker's references are required.

### FINANCIAL ACCOUNTS

#### Description

Required to file: No  
Source: Industry Sources  
Presentation: Key figures provided below  
Date of accounts: 31-12-2006  
Type of accounts: Estimated key figures  
Currency: US Dollar (USD)

#### Summarised

Period:	31-12-2006 12 months
Sales Turnover:	250,000,000

### OPERATIONS & HISTORY

#### Activities

Full description: The Subject is engaged in sugar, rice, fertilisers, cars and tyres import and distribution. The company provides also freight forwarding, shipping and logistics services. The Subject operates also a 361 room deluxe Hotel.

Products/services: MILAN distributes about 300,000 tons of parboiled rice into Nigeria. In a year, approximately 500,000 MT of cargoes comprising rice, sugar and fertilizers are handled. The company also handles 2,400 TU's carrying cube sugar, tyres and cars.

Brands: MILAN PRIDE, MILAN GOLD, TOMATO UNIQUE, RICE STAR, SUNRICE & CRYSTAL

### PROPERTY & ASSETS

#### Premises

The Subject operates from premises located at the heading address, consisting of administrative offices, warehouse space and harbour facilities.

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**PAYMENTS**

**Purchase Terms**

Local: Cash  
Credits 14-30 days  
Imports: L/Cs  
Credits 30 days net

**Sales Terms**

Local: Cash  
Credits 14-30 days  
Exports: L/Cs  
Credits 30 days net

**Payment Experience**

Payment Behaviour: As trade references were not supplied, the Subject's payment track record history CANNOT BE ACCURATELY DETERMINED, but payments are believed to be PROMPT.

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**INVESTIGATIVE NOTES**

Sources: Interviews and material provided by the Subject  
Other official and local business sources

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